

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

Jaklin Mecanik,

Case No. 819-71559-A736

Debtor.

Application

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Jaklin Mecanik, by her attorneys, Weinberg, Gross & Pergament LLP, as and for her Application represents as follows:

1. On March 4, 2019 (the "Filing Date"), the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code and filed the bankruptcy without the assistance of counsel.
2. The Chapter 13 Trustee filed a motion to dismiss the case.
3. Subsequently, Weinberg, Gross & Pergament LLP was contacted by the Debtor and determined that the Debtor did not qualify for Chapter 13 as the amount of debt due and owing on the first mortgage exceeded the amount which is permissible under Chapter 13.
4. On March 27, 2019, the Debtor applied for an Order converting her case from Chapter 13 to Chapter 11. The motion was originally returnable on May 13, 2019 but was adjourned by the Court due to a Court scheduling difficulty and the motion was granted on June 3, 2019.
5. The Debtor is a single mother who seeks to modify the first mortgage with respect to the real property located at 57 Steamboat Road, Great Neck, New York.
6. The Debtor and her two (2) minor children reside in the home and the Debtor's elderly mother also resides with her.

7. The Debtor encountered financial difficulties as an outgrowth of her divorce and was unable to meet her obligations as the Debtor had also lost her prior business.

8. The Debtor has also suffered financial problems involving very close family members and that has further worsened her financial situation.

9. The Debtor's ex-husband has now recommenced making required payments to her for maintenance and for child support and it is with those funds that the Debtor believes she is capable of a loan modification.

10. The Debtor is also commencing a new career which will hopefully also result in additional funds that can be used to meet the Debtor's obligations.

11. The Debtor requests that this Court grant her application to enroll in the loss mitigation program and achieve the modification of her first mortgage.

12. The Debtor respectfully requests this Court grant her application and such other and further relief as this Court deems just and proper.

13. No previous application for the relief sought herein has been made to this or any other Court.

WHEREFORE, it is respectfully requested that this Honorable Court grant the Debtor's motion and such other and further relief as to this Court seems just and proper.

Dated: Garden City, New York
June 20, 2019

Weinberg, Gross & Pergament LLP
Attorneys for Debtor and Debtor-in-Possession

By:

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